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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

JOHNNY WILLIAM JOHNSON, III,

Petitioner,

vs.

CALVIN JOHNSON, *et al.*,

Respondents.

Case No. 2:22-cv-00462-APG-EJY

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO REPLY TO
OPPOSITION TO MOTION TO DISMISS
(ECF NO. 59)

(FIRST REQUEST)**

Respondents, by and through counsel, AARON D. FORD, Attorney General of the State of Nevada, and CHRISTINE M. GREVE, Deputy Attorney General, hereby move this Court for an enlargement of time of thirty (30) days from the current due date of November 12, 2024, up to and including December 12, 2024, in which to file their reply to Petitioner Johnson's Opposition to Motion to Dismiss.

This motion is made pursuant to Fed. R. Civ. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel. This is the first enlargement of time sought by Respondents to file the reply, and the request is brought in good faith and not for the purpose of delay.

RESPECTFULLY SUBMITTED this 12th day of November, 2024.

AARON D. FORD
Attorney General

By: /s/ Christine M. Greve
Christine M. Greve (Bar No. 13135)
Deputy Attorney General

DECLARATION OF CHRISTINE M. GREVE

I, CHRISTINE M. GREVE, hereby declare, based on personal knowledge and/or information and belief, that the following is true:

1. I am a Deputy Attorney General in the Post-Conviction Division of the Office of the Nevada Attorney General. I make this declaration on behalf of Respondents' motion for enlargement of time.

2. The deadline to file the reply to the Opposition to the Motion to Dismiss is currently November 12, 2024. I have been unable with due diligence to timely complete this pleading. Therefore, I am requesting a thirty (30) day extension of time, up to and including December 12, 2024, to file the reply.

3. This motion is made in good faith and not for the purpose of delay.

4. The Opposition in this matter was filed on November 5, 2024. The deadline of November 12, 2024, is based on a seven-day calendaring schedule. The Opposition raises allegations of actual innocence, which are complex and require additional research and analysis than the seven-day period allows.

5. I will prioritize this case above all other matters. I anticipate completing the reply without further extension.

6. The counsel for Petitioner does not oppose this enlargement of time.

7. Based on the foregoing, I respectfully request an enlargement of time of thirty (30) days, up to and including December 12, 2024, in which to file a reply.

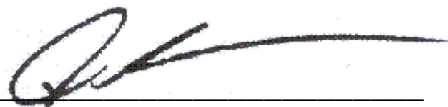
Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 12, 2024.

/s/ Christine M. Greve
Christine M. Greve (Bar No. 13135)
Deputy Attorney General

IT IS SO ORDERED:

Dated: November 13, 2024


ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE